

I'd like to submit my own personal comments about Ibiquity's IBOC system. I beleive that the system being approved for daytime use only will not offer any improvement or salvation for the AM band. Back when there were "daytimers", everybody listened to AM and got used to stations signing off and not hearing their favorite station at night. In this day and age, everyone listens to FM and can listen to their favorite FM station 24 hours a day 7 days a week. I don't think they're going to favor an AM station that yes---WILL sound not half bad during the day, but will go away at night (or at least shrink to the bandwidth of a telephone). I have to agree with the technical experts that there just isn't enough bandwidth to pass enough of a bit rate to give suitable results. The properties of AM just will not allow it to succeed and sound decent. What's going to happen when there's lightning? A noisy power line above? A tunnel? The signal will downgrade itself to the analog 3khz signal? Sounds to me like to the average consumer, it's going to "pop in and out". Well I'm sorry but again....in this day and age with everyone "used to" the crystal clear sound of FM that ISN'T subject to interference from lightning....popping...static.... noisy power lines.. is NOT going to put up with it. Even if it IS "digital". Just like the internet, when the bandwidth IS there, and all conditions are perfect and there's enough to "keep up with" the compressing and decompressing, things can sound pretty darn good. But AM isn't perfect....far from it. My suggestion? If you want to "improve and save" AM radio, go with the already proven technology of C-QUAM AM Stereo and AMaX specifications. I have played stereo recordings of C-Quam AM STEREO made from a GOOD receiver to MANY MANY people. Teenagers....adults...old and young... and most have said "well YES if AM sounded THAT good, then yeah it'd be decent. I'd listen!" And many said it sounded even better than the FM comparison. With IBOC being implemented on FM, people are going to have to buy new receivers anyway to pick it up. Why not MANDATE that all new recievers manufactured to receive IBOC on FM be equipped with C-Quam AM STEREO decoding and be up to AMaX specs...including the 7.5khz bandwidth and noise-blanking features. The RADIO STATIONS out there have to meet the standards and ALREADY sound this good without doing any transmitter upgrades and spending ANY money. The average consumer WOULD INDEED listen to AM even if it was monaural as long as the radio they're listening to has the 7.5Khz bandwidth. THAT sounds GOOD. What killed it is the manufacturers dumping the AM section in the mud and giving only 3 and 4khz bandwidth. OF COURSE it sounds muffled and sounds worse. I beleive the technology is already there at all AM stations. ALL AM stations are broadcasting crystal-clear audio at 10khz bandwidth. There just are hardly any radios to pick it up. IBOC on AM will only end up sounding like a "RealAudio" feed that keeps dropping out and buffering because it's losing packets. AM ANALOG sounds good and doesn't drop out like this. And with noise-blanking features a lot of the static and "10 khz night time whistle" are eliminated. When it starts fading, it's still there....it won't drop down to some inaudible bandwidth or start chirping and spitting because it's losing packets. All AM stations are ALREADY transmitting audio that sounds GOOD. There just aren't hardly any radios to pick it up that way. I think that mandating C-Quam AMS Capability and AMaX specs in ALL new radios produced to receive FM IBOC will indeed be able to be called "good sounding" radios. I can see new labels that say "with all new digital technology to receive FM IBOC digital and AMAX AM". The technology is already there....stations are already transmitting it. I beleive it is the radio manufacturers that killed AM...not AM itself. You have already approved C-Quam as the standard for transmitting AM in stereo. Some 400 stations are transmitting it as we speak and sounding marvelous to those who have AM STEREO. At the bit-rates that IBOC will be transmitting on the AM band, the audio will have little improvement over the 7.5khz bandwidth that is already being transmitted anyway. There will be new standards for all the new radios being manufactured for FM IBOC....why not mandate that the AM side be AMAX spec-

approved and C-Quam capable? I think most consumers not knowing what AM REALLY sounds like anyway will be very pleasantly surprised and impressed. What are the advantages of IBOC over analog anyway? New radios? More money consumers and LOTS MORE money that stations have to spend?? For WHAT? The FM sound is already great as it is right now. Will there indeed be THAT much improvement? If there were many advantages to digital and to IBOC I could see it being worth the cause. But I just don't see it. On FM...MAYBE. On AM...NO. I think it will make things a LOT worse than what we've already got. We already HAVE audio that sounds great on AM....just no radios to hear it that way.

Thank you
Sincerely
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